

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
AMERICAN HEALTH FOUNDATION,)
INC.; AHF MANAGEMENT)
CORPORATION;)
AHF MONTGOMERY, INC. d/b/a/)
CHELTENHAM NURSING AND)
REHABILITATION CENTER; and)
AHF OHIO, INC. d/b/a THE)
SANCTUARY AT WILMINGTON)
PLACE and d/b/a SAMARITAN CARE)
CENTER AND VILLA,)
)
 Defendants.)

Case No: 2:22-cv-02344-RBS

STIPULATION OF DISMISSAL WITH PREJUDICE

Plaintiff, the United States of America (“United States”), and Defendants American Health Foundation, Inc.; AHF Management Corporation; AHF Montgomery, Inc. d/b/a Cheltenham Nursing and Rehabilitation Center; and AHF Ohio, Inc. d/b/a The Sanctuary at Wilmington Place and d/b/a Samaritan Care Center and Villa (together, the “Parties”) entered into a settlement agreement in the above-captioned action dated June 2, 2025.

IT IS HEREBY STIPULATED AND JOINTLY AGREED, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, by and between the United States and Defendants, as represented by their undersigned counsel, that the action be dismissed in its entirety with prejudice, including claims by any party for an award by this Court of costs or attorney’s fees. Each party shall bear its own costs and attorney’s fees in connection with the action.

Respectfully submitted,

Dated: June 17, 2025

BRETT A. SHUMATE
Assistant Attorney General

/s/Benjamin Young
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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2025, I electronically filed the foregoing instrument with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Benjamin Young
Benjamin Young
Attorney for the United States